



# **Pimlico Neighbourhood Plan**

**Strategic Environmental Assessment  
Screening Report of the Submission Version  
(Regulation 16) of the Pimlico  
Neighbourhood Plan**

**May 2021**

## **CONTENTS**

<b>1</b>	<b>INTRODUCTION.....</b>	<b>1</b>
<b>2</b>	<b>LEGISLATIVE BACKGROUND .....</b>	<b>3</b>
<b>3</b>	<b>CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF EFFECTS REFERRED TO IN ARTICLE 3(5) OF DIRECTIVE 2001/42/EC.....</b>	<b>4</b>
<b>4</b>	<b>AREA CHARACTERISTICS .....</b>	<b>5</b>
<b>5</b>	<b>ASSESSMENT .....</b>	<b>12</b>
<b>6</b>	<b>SEA SCREENING OPINION.....</b>	<b>27</b>

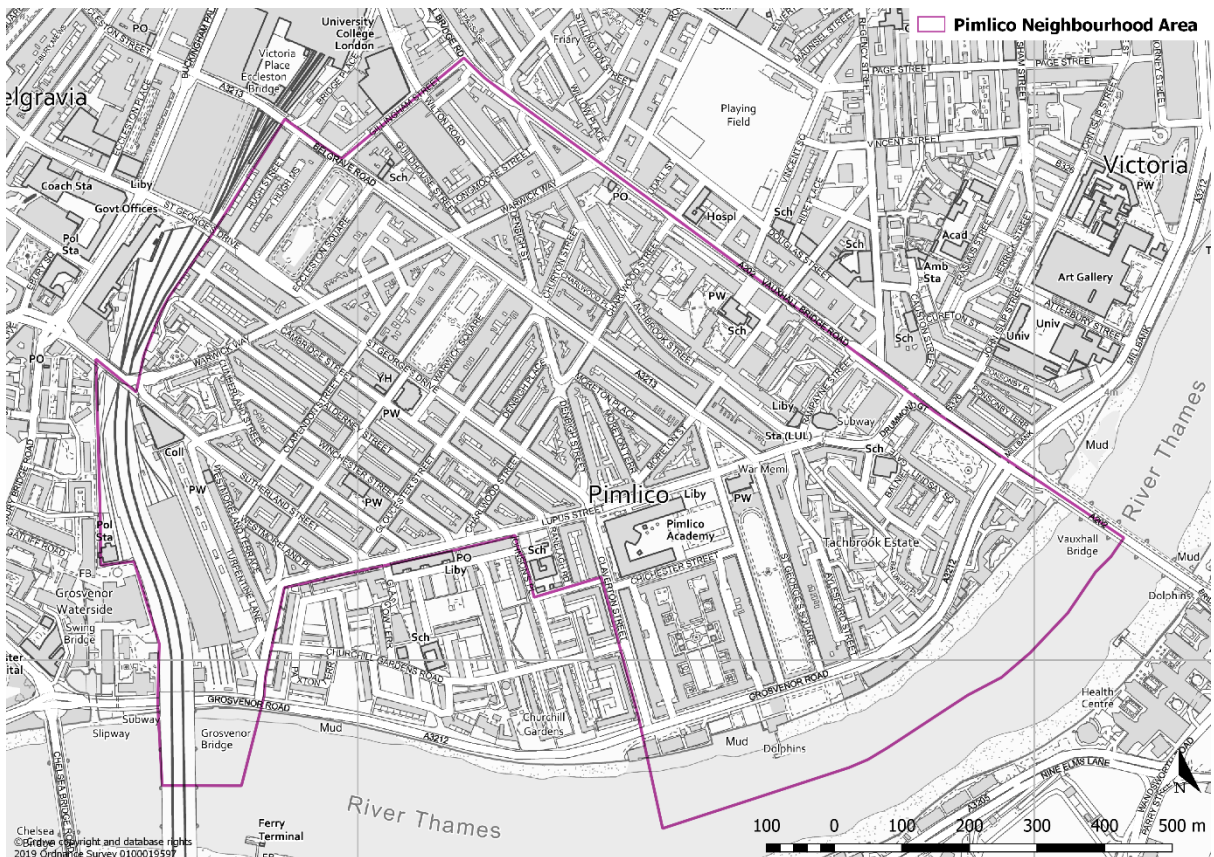
**APPENDIX A        STATUTORY DESIGNATIONS**

**APPENDIX B        RESPONSE BY STATUTORY BODIES TO DRAFT SEA  
SCREENING ASSESSMENT**

# 1 INTRODUCTION

- 1.1 This screening report is designed to determine whether or not the content of the Pimlico Neighbourhood Plan (the Plan) requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2 The Neighbourhood Plan covers a 19-year period from 2021 to 2040.
- 1.3 The designated Pimlico Neighbourhood Area (the Plan Area) is shown in Figure 1.1.

**Figure 1.1: Pimlico Neighbourhood Area**



- 1.4 The purpose of the Pimlico Neighbourhood Plan is to provide for the sustainable development of Pimlico. It seeks to do this through a number of objectives as follows:
  - Continue to maintain the quiet village atmosphere and its largely residential nature;
  - Improve the quality of life of current and future residents by a more vibrant retail and commercial sector and enhancing leisure and cultural facilities;
  - Ensure development respects and enhances the form and setting of the conservation areas;

- Protect the squares and green spaces and, where possible, add more of them;
- Improve the local environmental quality by continuing to limit and, if possible, reduce the harmful effects of traffic.

1.5 The legislative background set out below outlines the regulations that require this screening exercise. Section 4 provides a screening assessment of the likely significant environmental effects of the Plan and whether there is the need for an SEA.

## 2 LEGISLATIVE BACKGROUND

- 2.1 European Union Directive 2001/42/EC requires a Strategic Environmental Assessment to be undertaken for certain types of plans or programmes that would have a significant environmental effect. The Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations) require that this is determined by a screening process, which should use a specified set of criteria (set out in Schedule 1 of the Regulations). The results of this process must be set out in an SEA Screening Statement, which must be publicly available.
- 2.2 In accordance with Regulation 9 of the SEA Regulations 2004, the Pimlico Neighbourhood Forum (the qualifying body) has requested Westminster City Council (WCC), as the responsible authority, to consider whether an environmental report on the emerging Plan is required due to significant environmental effects. In making this determination, WCC should have regard to Schedule 1 of the Regulations.
- 2.3 The draft Plan has completed the pre-submission stage and further consultation with relevant statutory consultees has been undertaken by the Pimlico Neighbourhood Forum. In line with the advice contained within the National Planning Policy Framework (NPPF), Planning Practice Guidance, the plan's potential scope should be assessed at an early stage against the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004. The Pimlico Neighbourhood Forum has therefore consulted the statutory consultees (Historic England/Natural England/Environment Agency) and Westminster City Council on whether an environmental report/SEA is required.
- 2.4 An SEA can be required in some limited situations where a sustainability appraisal is not needed; Neighbourhood Planning is one of these situations. Sustainability Appraisals (SAs) may incorporate the requirements of the Strategic Environmental Assessment Regulations, which implement the requirements of the 'Strategic Environmental Assessment Directive' on the assessment of the effects of certain plans and programmes on the environment.
- 2.5 A sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues and it is good practice to do one to understand how a plan is to deliver sustainable development. However, National Planning Practice Guidance states that there is no legal requirement for a neighbourhood plan to undertake a sustainability appraisal as set out in section 19 of the Planning and Compulsory Purchase Act 2004. It is down to the qualifying body to demonstrate whether its plan is likely to have significant environmental effects. This is the purpose of this SEA Screening Report.

### **3 CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF EFFECTS REFERRED TO IN ARTICLE 3(5) OF DIRECTIVE 2001/42/EC**

3.1 Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out below:

1. The characteristics of plans and programmes, having regard, in particular, to:
  - the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
  - the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
  - the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,
  - environmental problems relevant to the plan or programme,
  - the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:
  - the probability, duration, frequency and reversibility of the effects,
  - the cumulative nature of the effects,
  - the trans-boundary nature of the effects,
  - the risks to human health or the environment (e.g. due to accidents),
  - the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
  - the value and vulnerability of the area likely to be affected due to:
    - special natural characteristics or cultural heritage,
    - exceeded environmental quality standards or limit values,
    - intensive land-use,
    - the effects on areas or landscapes which have a recognised national, Community or international protection status.

Source: Annex II of SEA Directive 2001/42/EC

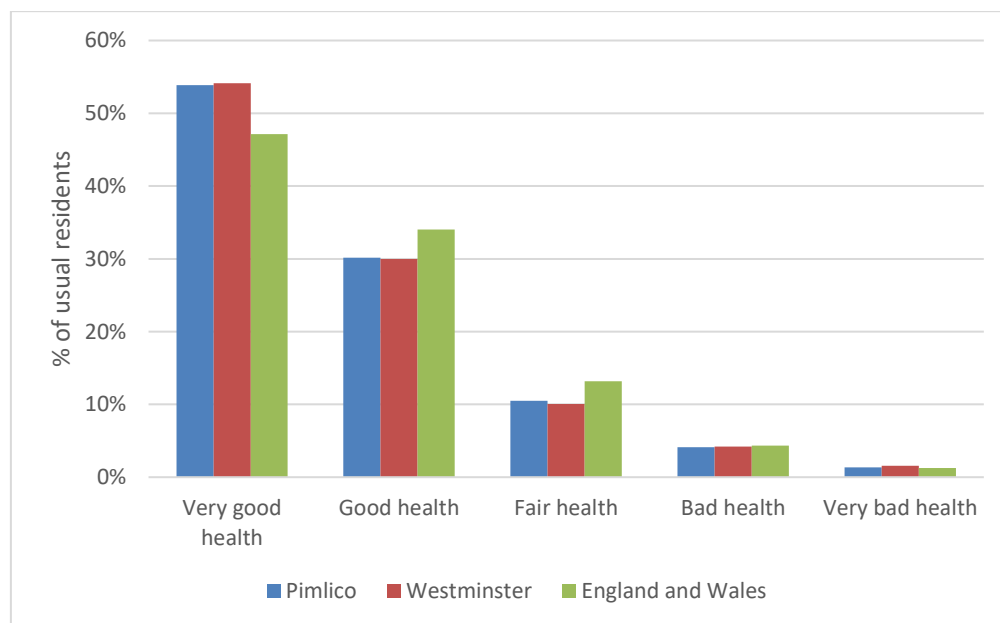
## 4 AREA CHARACTERISTICS

4.1 This section summarises the range of issues that must be considered as part of the SEA screening process.

### Area, population and health

4.2 The 2011 Census recorded a population in the Plan Area of just over 18,000 usual residents. Levels of deprivation are extremely low and overall health is good, as shown in Figure 4.1.

**Figure 4.1: General health levels, 2011**



Source: 2011 Census

N.B. The data for the Plan Area has been derived from output areas which do not totally match the extent of the Plan Area. However, the difference is not considered to be significant.

### Biodiversity, Flora and Fauna

4.3 Westminster borough has a diverse ecology although this is limited in the Plan area and the area that surrounds it. Over half of the Plan Area is deficient in nature<sup>1</sup>. The green spaces (the garden squares) in the Plan Area are Sites of Importance for Nature Conservation and some are areas where deciduous woodland – a priority habitat – can be found. The Plan Area is home to the following bird species<sup>2</sup>:

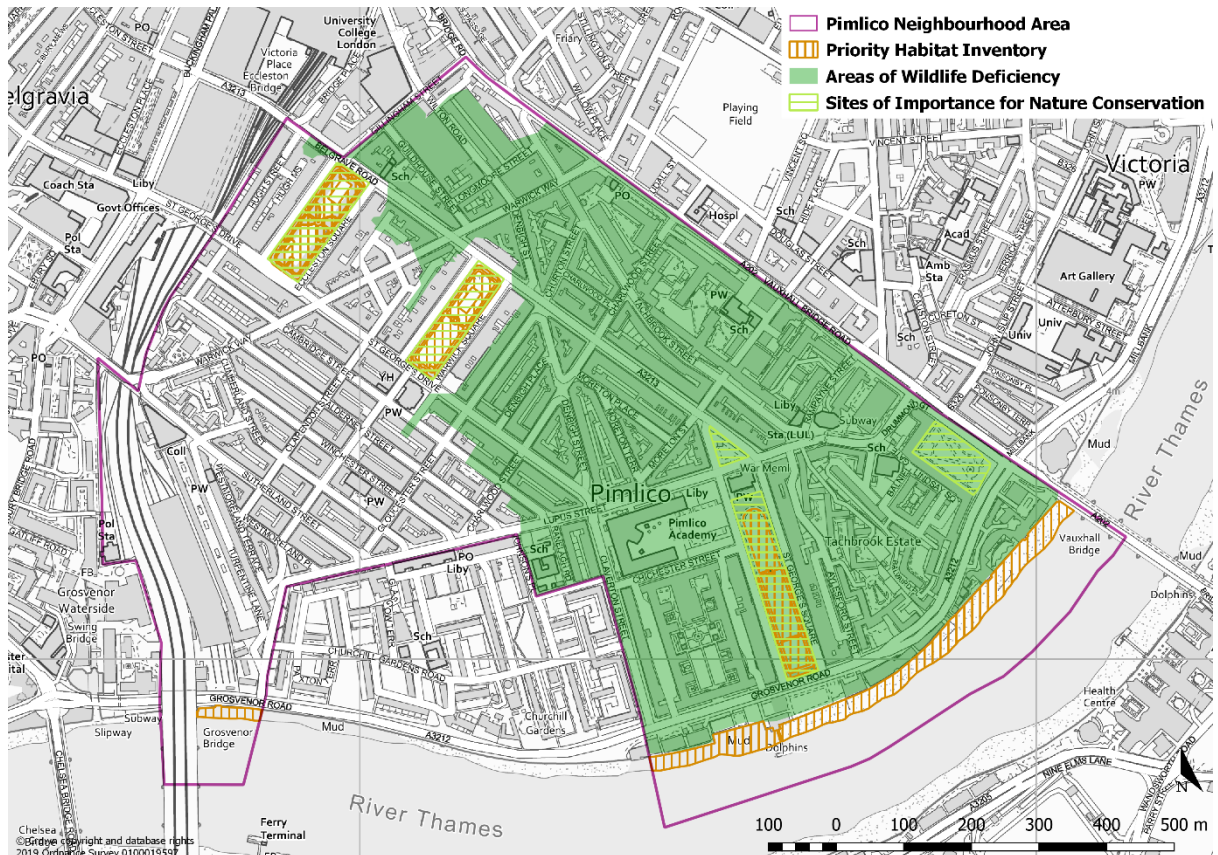
- Redshank (the whole Plan Area)
- Yellow Wagtail (eastern half of the Plan Area)

<sup>1</sup> Westminster City Plan, adopted 2021, Figure 28

<sup>2</sup> Defra MagicMap

- 4.4 Habitats include open spaces (including the Garden Squares), neighbouring Hyde Park and Kensington Gardens, standing open water (in the neighbouring Serpentine), veteran trees, built environment and private gardens.
- 4.5 This is shown in Figure 4.2.

**Figure 4.2: Biodiversity features in and close to the Neighbourhood Plan Area**



Source: MAGIC, DEFRA

- 4.6 The nearby Battersea Park provides a valuable function in terms of accommodating wildlife and have a role in ameliorating pollution.

### Soil

- 4.7 There is no agricultural land in or in close proximity to the Plan Area<sup>3</sup>.

### Water

- 4.8 The large majority of the Plan Area is within flood zone 3 with a very small part being within flood zone 2. The southern edges of the Plan Area closest to the River Thames are within the 0-30 minute rapid inundation zone, with further adjacent areas in the

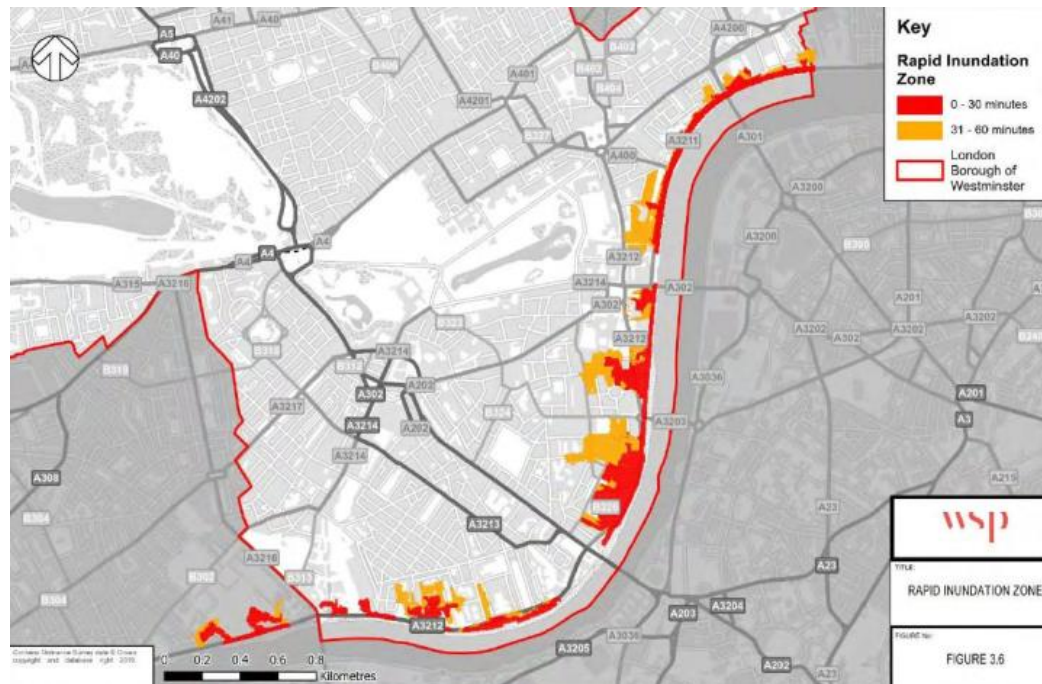
<sup>3</sup> Defra MagicMap



31-60 minute rapid inundation zone (see Figure 4.3a). A large part of the Plan Area is also a surface water flood risk hotspot (see Figure 4.3b).

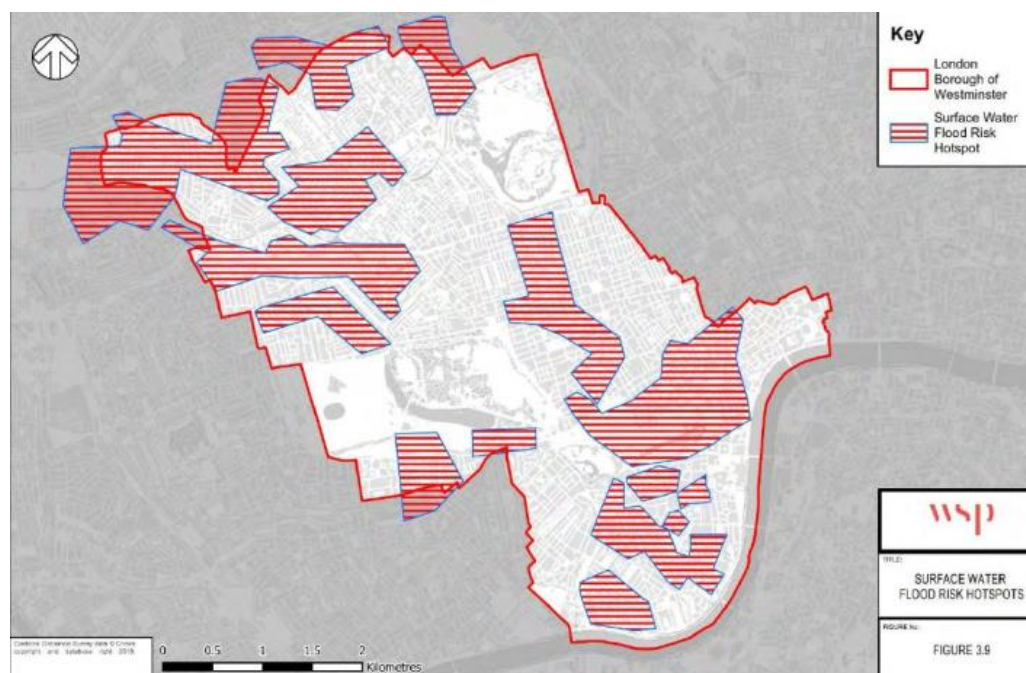
- 4.9 Besides the Thames Barrier, Westminster is protected from tidal and fluvial flooding by Thames Tidal Flood Defences including the Embankment wall.

**Figure 4.3a: Fluvial flood risk**



Source: City of Westminster City (2019) *Draft Strategic Flood Risk Assessment*, Figure 3.6

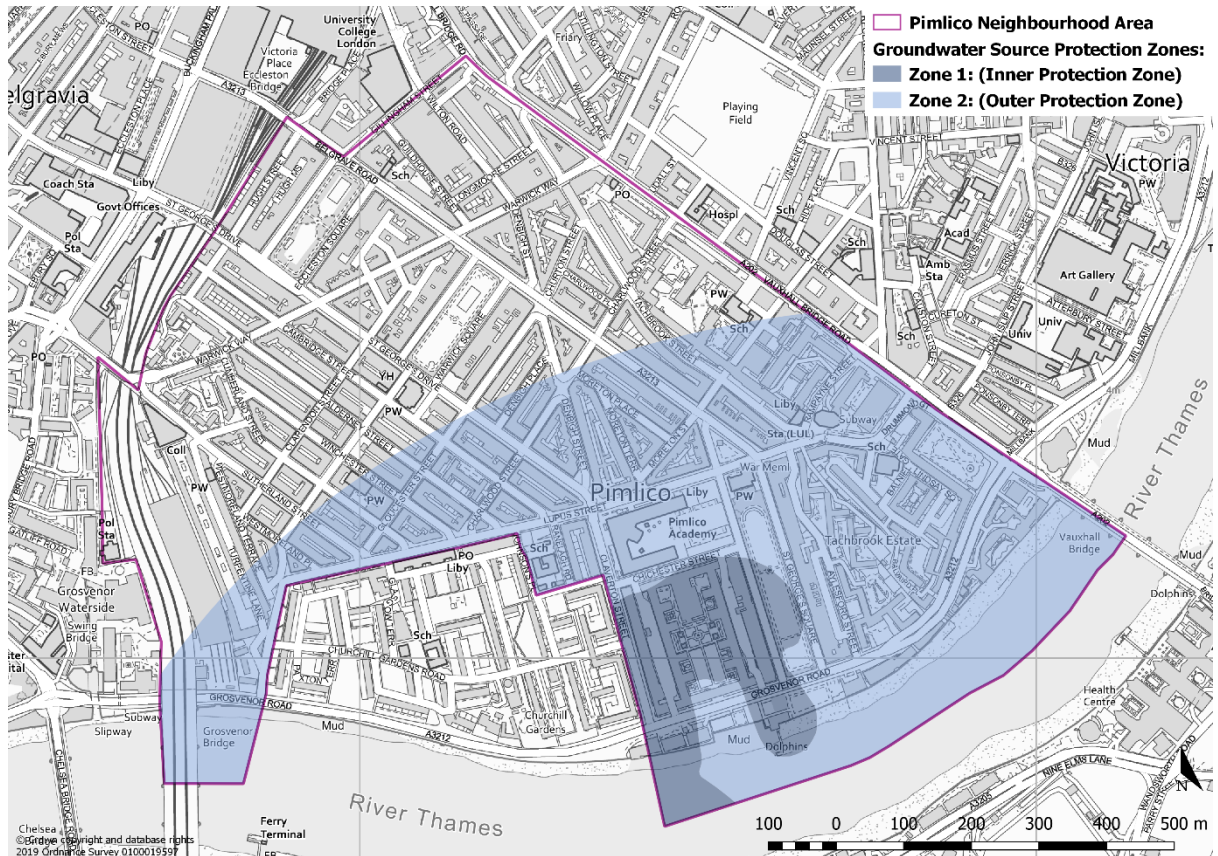
**Figure 4.3b: Surface water flood risk**



Source: City of Westminster City (2019) *Draft Strategic Flood Risk Assessment*, Figure 3.9

4.10 As shown in Figure 4.4, the southern part of the Plan Area is within a Groundwater Source Protection Zone. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk.

**Figure 4.4: Groundwater source protection zone**



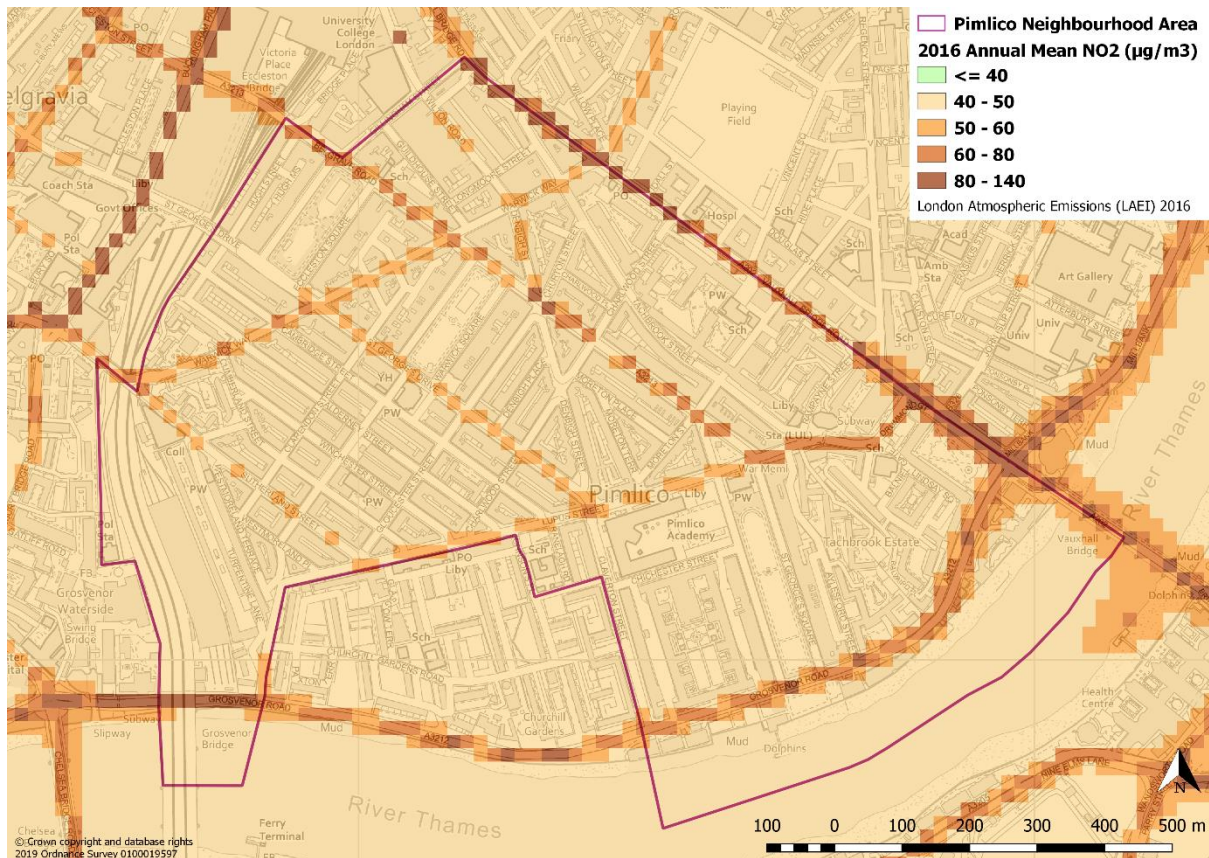
Source: Environment Agency

## Air

4.11 Westminster has some of the poorest air quality in the United Kingdom with concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulates (PM<sub>2.5</sub> and PM<sub>10</sub>) regularly exceeding guidelines which are set by the World Health Organisation (WHO) to protect human health. As a result, the whole of Westminster, including the Plan Area, has been designated an Air Quality Management Area.

4.12 Figure 4.5 illustrates the extent of air pollution across the Plan Area. Levels along Vauxhall Bridge Road and Grosvenor Road clearly significantly exceeded the WHO's guideline of 40 micrograms per cubic metre (ug/m<sup>3</sup>) for annual mean NO<sub>2</sub> in 2013. This guideline figure was also exceeded along a number of main routes through the Plan Area.

Figure 4.5: Modelled annual mean NO<sub>2</sub> air pollution, 2013



Source: London Air Quality Network, used with permission from the GLA and TfL

## Material assets

4.13 There are no existing or known historic landfill sites in or close to the area<sup>4</sup>. There is no current mining activity and no known mining activity has occurred in the last 30 years.

## Cultural heritage

4.14 The Neighbourhood Plan area has 83 listed buildings or structures, as shown in Figure 4.6<sup>5</sup>. The split of these buildings is as follows:

- Grade I – 2 buildings/structures
- Grade II – 67 buildings/structures
- Grade II\* – 14 buildings/structures

<sup>4</sup> Source: <https://www.westminster.gov.uk/contaminated%E2%80%90land>

<sup>5</sup> Source: National Heritage List for England

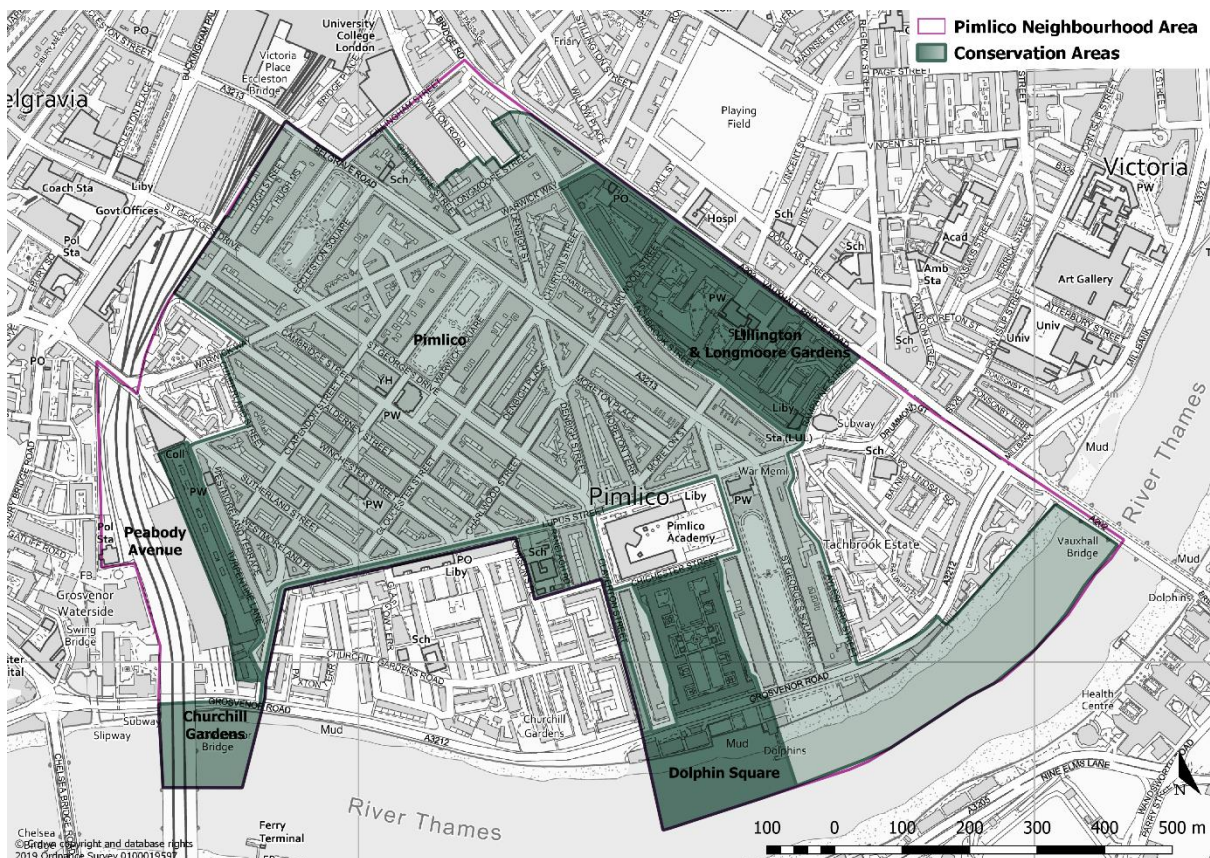
Figure 4.6: Listed buildings



Source: MAGIC, DEFRA

- 4.15 Of these buildings, the Church of St Gabriel in Warwick Square is on the register of Buildings at Risk because some of its roofs and masonry in other areas remain in poor condition.
- 4.16 The two Grade I listed buildings are the Church of St James the Less and the St James the Less Parish Rooms and Schools. There are a number of listed buildings close to the Plan Area boundary but none are on the register of Buildings at Risk.
- 4.17 Much of the area is covered by one of the five Conservation Areas shown in Figure 4.7.

**Figure 4.7: Conservation Areas**



- 4.18 The Neighbourhood Plan Area has approximately 200 Heritage Environmental Record (HER). The whole of the Plan Area is registered as a Tier 3 Archaeological Priority Area.<sup>6</sup>

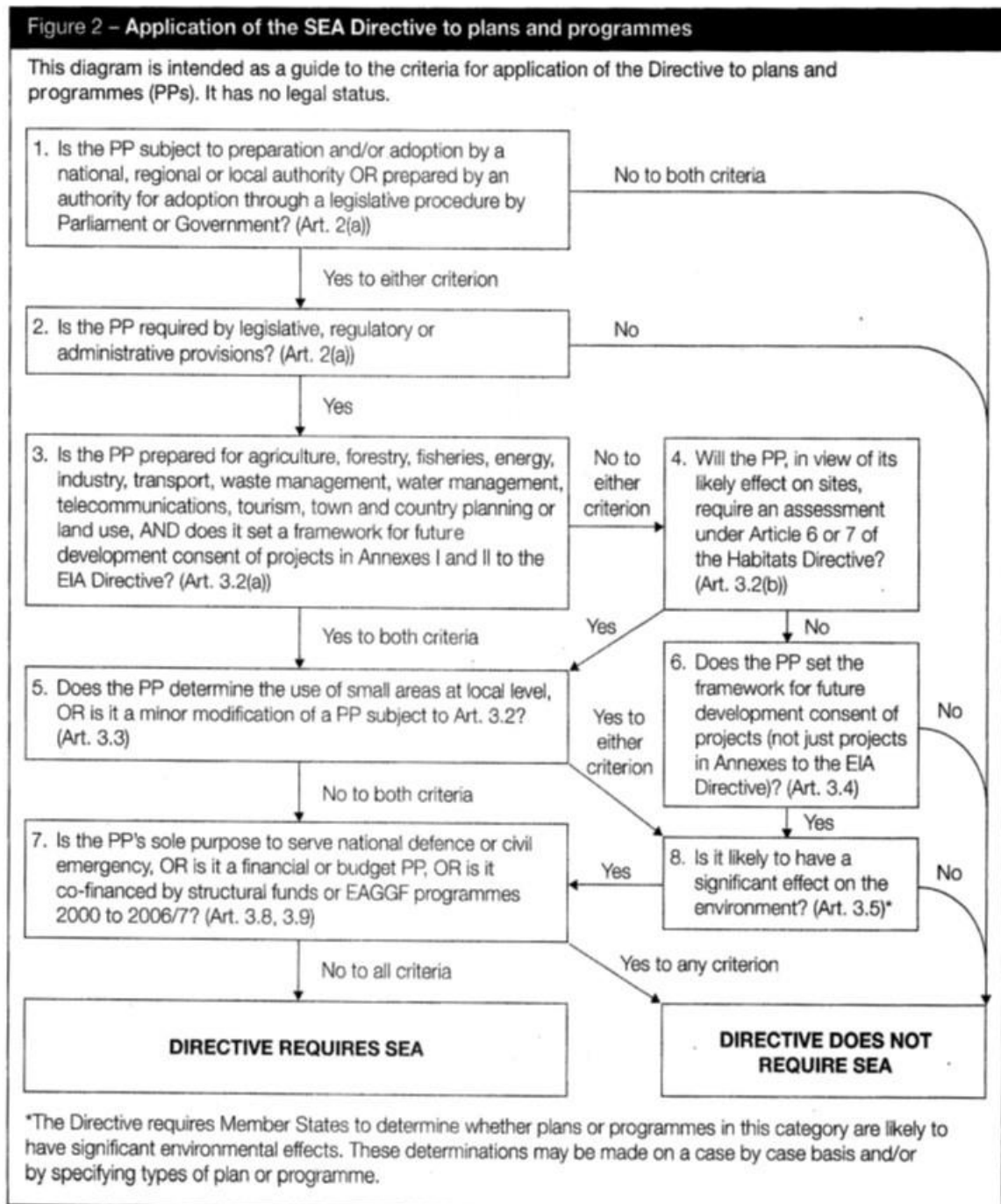
## Landscape

- 4.19 The Neighbourhood Area is in the Inner London National Character Area (NCA). Nothing specifically within the Plan Area is identified as a notable feature.

<sup>6</sup> Source: Heritage Gateway

## 5 ASSESSMENT

5.1 The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required:



5.2 The table below assesses in broad terms whether the Neighbourhood Plan will require a full SEA. The questions below are drawn from the previous diagram which sets out how the SEA Directive should be applied.

Stage	Y/N	Reason
1. Is the Neighbourhood Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The preparation and adoption of the NP is allowed under The Town and Country Planning Act 1990 as amended by the Localism Act 2011 and the Neighbourhood Planning Act 2017. The NP is being prepared by Pimlico Neighbourhood Forum (as the "relevant body") and will be 'made' by Westminster City Council as the local authority subject to passing an independent examination and community referendum. The preparation of NPs is subject to the following regulations: The Neighbourhood Planning (General) Regulations 2012 (as amended) and the Neighbourhood Planning (referendums) Regulations 2012.
2. Is the Neighbourhood Plan required by legislative, regulatory or administrative provisions? (Art. 2(a))	Y	Whilst the Neighbourhood Plan is not a requirement and is optional under the provisions of the Town and Country Planning Act 1990 as amended by the Localism Act 2011, it will if 'made', form part of the statutory Development Plan for the Borough. It is therefore important that the screening process considers whether it is likely to have significant environmental effects and hence whether a full SEA is required under the Directive.
3. Is the Neighbourhood Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Y	Neighbourhood Plans can cover some of the topics identified in this list and they could set the framework for development of a scale that would fall under Annex II of the EIA Directive. However for Neighbourhood Plans, developments which fall under Annex I of the EIA Directive are 'excluded development' as set out in Section 61k of the Town and Country Planning Act 1990 (as amended by the Localism Act).
4. Will the Neighbourhood Plan, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	N	A screening assessment for a Habitats Regulations Assessment (HRA) has been prepared separately. An HRA Screening Report prepared on the draft Submission Version (Regulation 16) of the Plan was consulted on with Westminster City Council and Natural England. Neither Westminster City Council nor

Stage	Y/N	Reason
		Natural England considered that the Regulation 16 version of the Plan would have a significant effect on designated areas under the Habitats Directive. It is therefore considered that an HRA is not required.
5. Does the Neighbourhood Plan determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	Y	The Plan identifies specific uses for the Queen Mother Sports Centre site within the Neighbourhood Plan Area, including leisure and employment uses.
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y	The Neighbourhood Plan is to be used by Westminster City Council in helping determine future planning applications. The neighbourhood plan however focuses on shaping how development comes forward.
7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N	
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	N	<p>The environmental designations have been identified further in the Pimlico baseline information in Section 4 and in the Appendix, which includes maps, distances and vulnerability.</p> <p>The Plan is not considered to have significant effects on the environment. Any likely effects are related to the objectives of the Plan in respect of generally protecting and enhancing the Plan Area and are not considered to be significant. The assessment of likely effects is shown in Table 5.1.</p>



## Assessment of likely significant effects

- 5.3 Under criterion 8 of the assessment in the table above, it was concluded that a Neighbourhood Plan may have a significant effect on the environment depending on the proposals within it and that a case by case assessment was required. The criteria for undertaking such an assessment are drawn from Article 3.5 of the SEA Directive and set out in Section 3 of this report. Table 5.1 outlines the results of this assessment.
- 5.4 It should be noted that, where a policy in the Plan (notated with the prefix 'PIM') is not specifically identified in Table 5.1, it has been assessed as not having an environmental effect.

**Table 5.1: Assessment of likelihood of significant effects on the environment**

Significant effect criteria	Assessment
<p>1. The characteristics of the plans, having regard to:</p> <p>a. the degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;</p>	<p>The Plan provides a set of policy principles for major development in certain locations, including the Queen Mother Sports Centre (PIM24). This site is not allocated in the Westminster City Plan. Specifically the policy addresses the scale of development, seeking to ensure that the bulk, height and mass of any major development is in keeping with the surrounding area and that it provides public open spaces, including green spaces. The policy sets the framework for the nature of development projects in these locations which will have positive effects, although these are not likely to be significant. This is because the amount of development is likely to be small.</p> <p>The Neighbourhood Plan guides development within each of the conservation areas (PIM4-PIM7). Policy PIM11 provides clarity on what is considered tall in terms of building height.</p> <p>The Neighbourhood Plan also guides development within the public realm generally and at certain junctions (PIM19), securing and protecting the public realm around any river crossings, including from Nine Elms to Pimlico (PIM20), riverside activities (PIM21) and the Wilton Road/Warwick Way public realm (PIM22).</p>

Significant effect criteria	Assessment
	<p>It therefore sets the framework for the nature of development projects in these locations which will have positive effects, although these are not likely to be significant. This is because the amount of development is likely to be small.</p> <p><b><i>There therefore has the potential for positive effects on the environment resulting from proposals and projects identified in the Plan. However, the positive effects are not considered likely to be significant. This is particularly the case given that the Plan does not allocate any specific sites for development.</i></b></p>
<p>b. the degree to which the plan influences other plans and programmes including those in a hierarchy;</p>	<p>A Neighbourhood Plan must be in general conformity with the strategic policies of the City Plan for the London Borough of Westminster and the London Plan. It does not influence other plans.</p> <p><b><i>Due to the fact that it does not directly influence any other plans or programmes, the Plan is unlikely to have a significant positive environmental effect or a significant negative environmental effect on the implementation of those plans or programmes.</i></b></p>
<p>c. the relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development;</p>	<p>A Neighbourhood Plan is required to contribute to the achievement of sustainable development and therefore the likelihood of significant effects on the environment should be minimised through the policy framework.</p> <p>The Plan includes policies that seek to positively address a number of environmental aspects of sustainable development. The natural environment – specifically biodiversity and the protection of natural resources – is addressed through the landscaping and planting in public open spaces (PIM18), protection of local green spaces (PIM17) and energy use/air quality (PIM23). All these policies will have positive effects but the limited scale of development means that these will not be significant.</p> <p>The Plan has a positive effect on the heritage environment through policies that address</p>

Significant effect criteria	Assessment
	<p>development in the conservation areas (PIM4-PIM7), non-designated heritage assets (PIM8) and ensuring good design through the use of a design review panel (PIM9). Policy PIM3 seeks to ensure that upward extensions preserve and enhance the character of the Pimlico Conservation Area. Policy PIM11 provides clarity on what is considered tall in terms of building height and, whilst providing clarity on the prevailing context height in each area, is clear that Pimlico is generally not suitable for tall buildings. The limited scale of development means that these effects will not be significant.</p> <p>The Plan also has a positive effect on human (social) aspects of the environment through policies that improve public open spaces (PIM18) and public realm (PIM19), including along the riverside (PIM21) and Wilton Road/Warwick Way (PIM22). The limited scale of development means that these will not be significant.</p> <p><b><i>These policies are considered to have a positive effect on the Neighbourhood Plan Area's environment (natural, heritage and human aspects of the environment) in terms of promoting sustainable development. However, given the size of the area and the limited likely scale of new development, such effects are not considered likely to be significant.</i></b></p>
<p>d. environmental problems relevant to the plan;</p>	<p>The environmental effect of some of the proposals within the Plan could be negative but such effects are not likely to be significant due to the scale of development proposed – only the policy relating to major development sites (PIM24) addresses development at a specific site (the Queen Mother Sports Centre) and the extent of the site means that any development would likely be below the Environmental Impact Assessment Regulations thresholds for urban development projects.</p> <p><b><i>It is considered that the policies relating to redevelopment of major development sites could have a negative effect on the environment of the</i></b></p>

Significant effect criteria	Assessment
	<p><b><i>Neighbourhood Plan Area but this effect is not likely to be significant.</i></b></p> <p>Certain specific environmental problems can be addressed through the implementation of the Neighbourhood Plan and there are a number of policies which seek to do this and thereby have a positive environmental effect - landscaping and planting in public open spaces (PIM18), protection of local green spaces (PIM17) and maximisation of energy efficiency (PIM23). However, the likely scale of development in the Neighbourhood Plan Area means that such effects are not likely to be significant.</p> <p><b><i>These policies are considered to have a positive effect on the environment of the Neighbourhood Plan Area in terms of addressing environmental problems. However, given the size of the area and the limited likely scale of new development, such effects are not considered likely to be significant.</i></b></p>
<p>e. the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).</p>	<p>The Neighbourhood Plan has to be in conformity with the City Plan and London Plan. The City Plan and London Plan both have regard to European Union (EU) legislation on the environment and therefore the Neighbourhood Plan already meets the requirements of this legislation.</p> <p>The Neighbourhood Plan, in its preparation, has taken into account the following EU legislation and strategies:</p> <ul style="list-style-type: none"> <li>• EU Habitats and Conservation of Wild Birds Directives (92/43/EEC and 79/409/EEC)</li> <li>• EU Water Framework Directive (2000/60/EC)</li> <li>• EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC)</li> <li>• EU Waste Directive (2008/98/EC)</li> <li>• EU Thematic Strategy on Air Pollution</li> <li>• Europe 2020: A strategy for smart, sustainable and inclusive growth.</li> </ul> <p>Many of the policies in the Neighbourhood Plan will make a positive contribution towards the achievement of the targets in this legislation and these strategies, therefore will have a positive environmental effect. This particularly includes</p>

Significant effect criteria	Assessment
	<p>policies on landscaping and planting in public open spaces (PIM18), protection of local green spaces (PIM17) and maximisation of energy efficiency (PIM23). However, the likely scale of development in the Plan Area means that such positive effects are not likely to be significant.</p> <p><b><i>The policies in the Plan are likely to have a positive effect on the environment of the Neighbourhood Plan Area in terms of their contribution towards the implementation of Community legislation on the environment. However, this effect is not likely to be significant. This is particularly the case given the size of the area and the likely scale of new development.</i></b></p>
<p>2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</p>	
<p>a. the probability, duration, frequency and reversibility of the effects,</p>	<p>Through its policies, the Plan recognises that development will come forward within the Plan area and therefore there could be some effects of environmental change that will take place. All of this development is likely to be on previously developed land so there will be no loss of green space or agricultural land therefore any negative effects will not be significant. Policy PIM17 will protect existing local green spaces in the Neighbourhood Plan area. In addition, policies relating to landscaping and planting in public open spaces (PIM18) seek to incorporate biodiversity features into new development with the intention of enhancing the local environment and thereby having a positive effect. Such positive effects are not likely to be significant.</p> <p><b><i>The Plan is considered to have both positive effects and negative effects on the environment of the Neighbourhood Plan Area in terms of the probability, duration, frequency and reversibility of the effects. However, given the size of the area and the limited likely scale of new development, neither of these types of effect are considered likely to be significant.</i></b></p> <p>Development on the Queen Mother Sports Centre site (PIM24) could intensify the use of the</p>

Significant effect criteria	Assessment
	<p>site compared with the existing use. Redevelopment, based on the requirements of the policy, would increase the footfall through the site although the overall negative environmental effect on biodiversity compared with the existing use is not likely to be significant. Other types of use would also increase footfall but would be associated with new built development on the site. The probability, duration and frequency of any negative environmental effects would therefore not be significant. Development could also have positive effects in terms of addressing housing needs, improving access to leisure uses and improving the range of commercial activities that provide services to the local community. Overall it is considered that such positive effects will not be significant.</p> <p><b><i>It is considered that the Neighbourhood Plan's policy relating to redevelopment of the Queen Mother Sports Centre is likely to have both negative and positive effects on the environment of the Neighbourhood Plan Area in terms of the probability, duration, frequency and reversibility of the effect. However, the scale of development compared with the existing use mean that none of these effects are likely to be significant.</i></b></p>
<p>b. the cumulative nature of the effects,</p>	<p>The cumulative effects of proposals within the Plan are unlikely to be significant on the local environment. In addition, there are no proposals or policies within the Westminster City Plan which, in combination with the Plan, create the potential for any more significant widespread cumulative effects. PIM24 in respect of development on the Queen Mother Sports Centre site and possibly on other major development sites does allow the possibility of additional uses to those in the Westminster City Plan but any possible negative effects such as noise, air pollution and habitat loss are required to be mitigated which would mean that they would not be significant.</p> <p>The Plan includes policies that seek to have a positive effect on the environmental aspects of</p>

Significant effect criteria	Assessment
	<p>sustainable development – specifically, landscaping and planting in public open spaces (PIM18), protection of local green spaces (PIM17) and maximisation of energy efficiency (PIM23). These policies are likely to have a positive effect but the limited nature of development likely in the Neighbourhood Area mean that their effect will not be significant.</p> <p><b><i>It is considered that the policies in the Plan are likely to have a positive cumulative effect on the environment of the Neighbourhood Plan Area and the surrounding area. However, given the size of the area and the limited likely scale of new development, such cumulative effects are not considered likely to be significant.</i></b></p>
<p>c. the transboundary nature of the effects,</p>	<p>Whilst the Pimlico Neighbourhood Area is adjacent to the borough boundaries with Wandsworth and Lambeth, the physical boundary is with the River Thames. Therefore the proposals within the Plan are not likely to have an effect on neighbouring areas.</p> <p><b><i>It is not considered that the policies in the Plan are likely to have any negative effects on the environment of neighbouring areas.</i></b></p> <p>The possible crossings from Nine Elms to Pimlico are dealt with in (PIM20), where the negative effects of additional pedestrian footfall entering the area are expected to be mitigated and would therefore have a positive environmental effect although this is not likely to be significant and will mostly mitigate impacts at the Pimlico end.</p> <p><b><i>This policy is likely to have a positive environmental effect on the areas immediately adjacent to the Neighbourhood Plan Area. However, given the size of the Area and the limited likely scale of new development within it, this effect is not considered likely to be significant. There are not considered to be any wider effects further beyond these immediate areas.</i></b></p>
<p>d. the risks to human health or the environment (e.g. due to accidents),</p>	<p>There is limited risk to human health or the environment as a result of the policies that relate to development expected to come forward. The</p>

Significant effect criteria	Assessment
	<p>policy relating to safe pedestrian movement from any river crossing into the area (PIM20) is likely to result in a positive effect in terms of pedestrian safety. However, the scale of development in the Area means that such effects are not likely to be significant.</p> <p><b><i>This policy is expected to have a positive environmental effect on the Neighbourhood Plan Area in terms of human health. However, given the size of the area and the limited likely scale of new development, this effect is not considered likely to be significant.</i></b></p>
<p>e. the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)</p>	<p>The Neighbourhood Plan area covers just 0.87km<sup>2</sup> (source: Goole Earth Pro) and has approximately 18,000 residents. This is just 4.0% of the area of the City of Westminster and 8.2% of its population (source: 2011 Census).</p> <p>The Neighbourhood Plan does not specifically propose development. The major sites it considers - with the Queen Mother Sports Centre being the only one specifically identified - may deliver a scale of development that is relatively small and therefore the potential for environmental effects is also likely to be particularly limited and localised in terms of its effect on the population. The policies relating to public open space (PIM18), public realm (PIM19), river crossings (PIM20), riverside activities (PIM21) and the Wilton Road/Warwick Way public realm (PIM22) will have a positive effect on residents and visitors to the Area although these will not be significant in terms of their environmental effect.</p> <p>The Neighbourhood Plan does not allocate any sites for development and only addresses one development site of significance, the Queen Mother Sports Centre. The negative effects of this development, given that the site is already previously developed and currently in use and given that it sits within a well built-up area, means that any effect will be localised and not significant.</p>



Significant effect criteria	Assessment
	<p><b><i>It is likely that both the positive effects and negative effects of the proposals within the Plan will be limited in magnitude and spatial extent. It is therefore considered that neither the positive effects nor the negative effects on the environment of the Neighbourhood Plan Area are likely to be significant.</i></b></p>
<p>f. the value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> <li>- special natural characteristics or cultural heritage,</li> </ul>	<p>The Plan seeks to enhance the natural environment and the cultural heritage of the area through some of its policies. The broad environmental characteristics of the area are in section 4 of this report.</p> <p>In relation to the natural environment, the area is predominantly built up, with small pockets of green space provided by the squares. These are not designated as nationally or internationally important but are on Historic England’s landscape register. Some are also protected by the London Squares Act. Policies covering landscaping and planting in public open spaces (PIM18), protection of local green spaces (PIM17), public realm (PIM19), river crossings (PIM20), riverside activities (PIM21), the Wilton Road/Warwick Way public realm (PIM22) and maximisation of energy efficiency (PIM23) seek to ensure that environmental quality standards are met. This will have a positive effect although the scale of development expected in the Neighbourhood Area means that such effects will not be significant.</p> <p><b><i>These policies are expected to have a positive effect on the environment of the Neighbourhood Plan Area in terms of its natural characteristics. However, given the size of the area and the limited likely scale of new development, such effects are not considered likely to be significant.</i></b></p> <p>In relation to the historic and cultural heritage, there are many listed buildings in and adjacent to the area and much of the area itself has Conservation Area status. However, there is only one building at risk in either the Neighbourhood</p>



Significant effect criteria	Assessment
<p>landscapes which have a recognised national, community or international protection status.</p>	<p>There are no landscapes which have a recognised national, community or international protection status in or near the Neighbourhood Plan Area. The Plan does provide policies that apply within Conservation Areas which cover large parts of the area. As explained above, these policies seek to enhance the existing heritage assets of the area, thereby having a positive effect. However, the likely scale of development in the conservation areas will be limited therefore the environmental effect is unlikely to be significant.</p> <p><b><i>There is likely to be a positive environmental effect on the conservation areas in the Neighbourhood Plan area but this is not considered likely to be significant.</i></b></p> <p>There are four European sites within 10km of the Borough of Westminster (see the Appendix for location of sites in relation to Pimlico, description of sites and their distances from Pimlico). Some areas are covered by more than one designation. All the sites are listed below:</p> <ul style="list-style-type: none"> <li>• Wimbledon Common SAC;</li> <li>• Richmond Park SAC;</li> <li>• Epping Forest SAC and RAMSAR;</li> <li>• Essex Thames Estuaries SAC and RAMSAR.</li> </ul> <p>Of these four SACs, only Wimbledon Common and Richmond Park are within 10km of Pimlico.</p> <p>The Neighbourhood Plan focuses, amongst other things, on shaping development, and protecting, maintaining and enhancing existing green space assets. It does not propose specific development sites, but instead provides further local criteria that should be met by any development of major sites including the Queen Mother Sports Centre (PIM24).</p> <p>Policies that seek to address positively the environmental aspects of sustainable development – specifically landscaping and planting in public open spaces (PIM18), protection of local green spaces (PIM17) and maximisation</p>

Significant effect criteria	Assessment
	<p>of energy efficiency (PIM23) – are likely to have a positive effect on the SAC/RAMSAR sites. However, because of the location of these sites well away from the Neighbourhood Plan Area, the effect is not likely to be significant. The Habitats Regulations Assessment Screening Report on the Reg 16 Version of the Plan considers that the Plan is not likely to have a significant effect on any protected areas.</p> <p><b><i>The Neighbourhood Plan is likely to have a positive environmental effect on the identified network of protected sites but, given the distance from them, this is not likely to be significant.</i></b></p>

## 6 SEA SCREENING OPINION

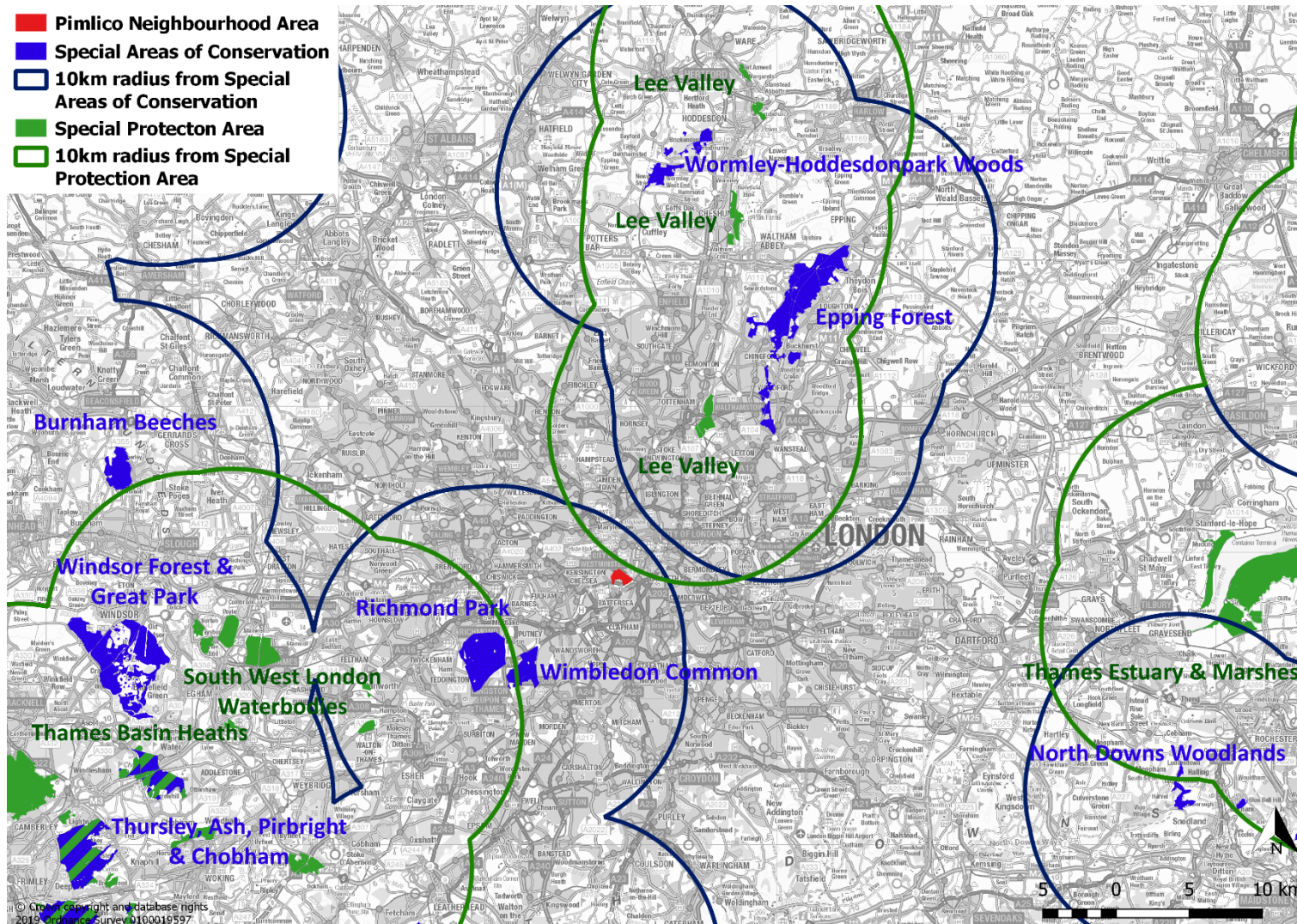
- 6.1 As a result of the assessment in section 5, it is unlikely there will be any significant environmental effects arising either individually or cumulatively from the draft Pimlico Neighbourhood Plan policies. The reasons for reaching this opinion include:
- i. All the objectives of the Neighbourhood Plan relate to the enhancement and improvement of activities in the Area. Although these objectives are reflected in policies that are likely to have a range of environmental, social and economic benefits, it is not considered likely that these could represent *significant* environmental effects.
  - ii. The limited scale of the area (0.87km<sup>2</sup>) and population (18,000 residents) mean that any effects of a Neighbourhood Plan are unlikely to be significant.
  - iii. The Neighbourhood Plan does not allocate any specific sites for development.
  - iv. The only specific site that is referred to for development is the Queen Mother Sports Centre. Development where Policy PIM24 would apply relates to the framework for redevelopment if needed rather than the promotion of new development, therefore would not have a significant effect.
  - v. Apart from this site there is unlikely to be much significant additional development because much of the Neighbourhood Area has already been developed.
  - vi. The Neighbourhood Plan does not propose any specific development close to sensitive natural assets (on the register of Buildings at Risk) in and adjacent to the Area. In addition, the City Plan provides significant protection to heritage assets.
  - vii. The Neighbourhood Plan does not propose any specific development close to sensitive heritage assets in and adjacent to the Area.
- 6.2 Any development proposal that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment at the project application stage.
- 6.3 As such, it is considered under Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004, that the Pimlico Neighbourhood Plan does not require an SEA to be undertaken because it is not likely to have significant environmental effects.
- 6.4 The outcome of this screening report has been subject to review by Natural England, Historic England and Environment Agency as well as Westminster City Council. Natural England, Environment Agency and Westminster City Council all agreed with

this assessment – their responses are shown in Appendix B. Historic England had concerns about the impact of Policy PIM3 in respect of upward extensions. Specifically this related to whether the Westminster City Plan Sustainability Appraisal could be relied upon (see Historic England letter dated 2<sup>nd</sup> February 2021 in Appendix B). Following engagement with Westminster City Council it was confirmed that such matters had been addressed satisfactorily in new City Plan, adopted in April 2021, and in its Sustainability Appraisal. Historic England's letter dated 28<sup>th</sup> April 2021 confirms that it is content and does not consider that Policy PIM3 is likely to have a significant environmental effect.

## **APPENDIX A - STATUTORY DESIGNATIONS**

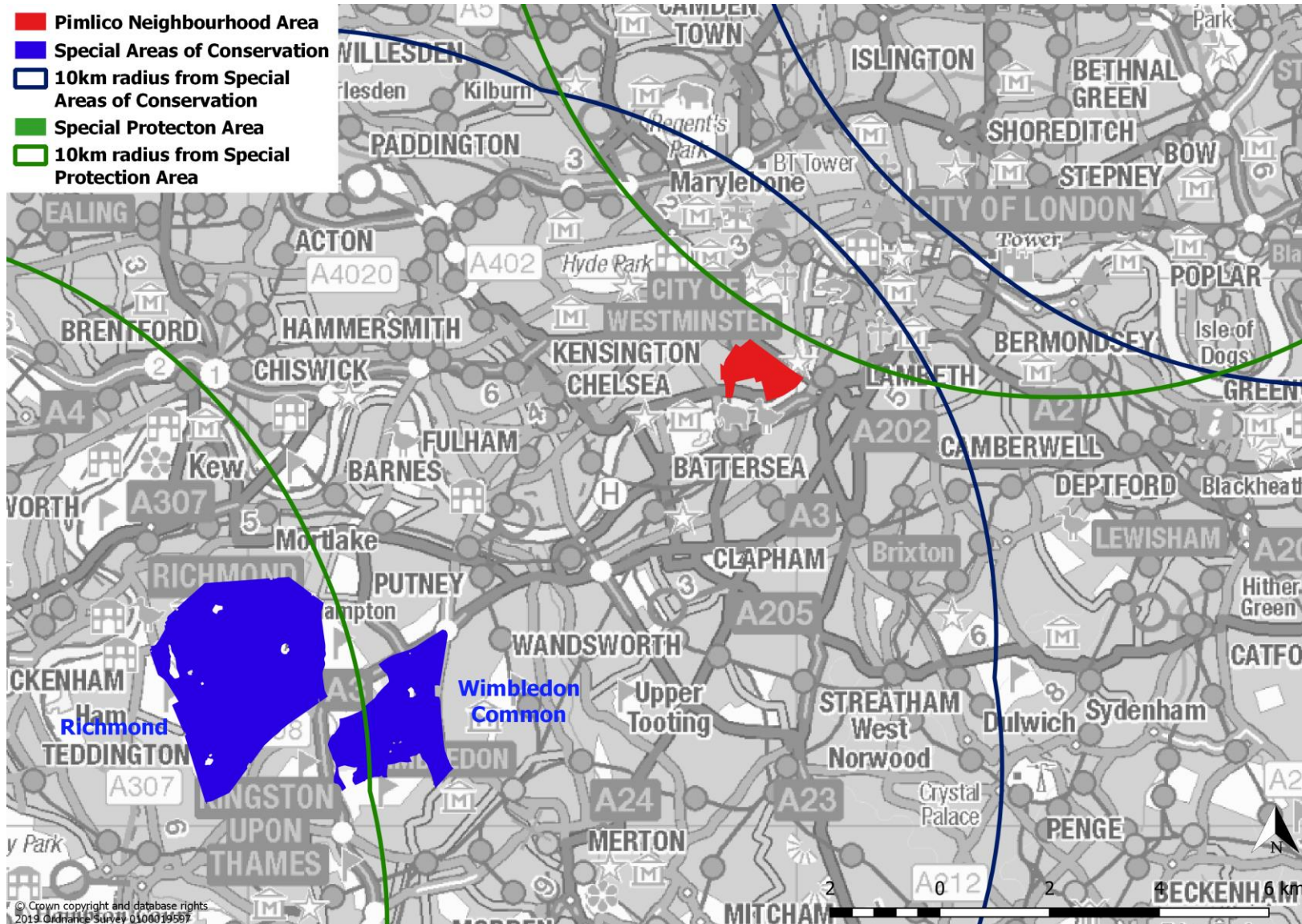
Designation relates to, or having the nature of, a statute (such as the Wildlife and Countryside Act, 1981, or the National Parks and Countryside Act, 1949). The NPPF states for plan-making that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: specific policies in the NPPF indicate development should be restricted. For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion. See [circular 05/2006](#).

**Map showing the location of the Pimlico Neighbourhood Area within a 10km radius of SACs and SPAs**



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Ordnance Survey © Crown copyright and database right 2017

## **Special Areas of Conservation**

A Special Area of Conservation (SAC) is the land designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora.

### **Site characteristics and conservation objectives**

The following is extracted from the Appropriate Assessment Screening Report for the NPPF revisions to the Westminster Core Strategy in relation to Special Protection Areas (SPAs), Special Areas of Conservation and wetlands of international importance.

**Wimbledon Common SAC**

<b>Location of Wimbledon Common SAC</b>	
Country	England
Unitary Authority	Merton; Wandsworth
Grid Ref*	TQ227719
Latitude	51 25 56 N
Longitude	00 14 04 W
SAC EU code	UK0030301
Status	Designated Special Area of Conservation (SAC)
Area (ha)	348.31
* This is the approximate central point of the SAC. In the case of large, linear or composite sites, this may not represent the location where a feature occurs within the SAC.	
<b>General site character</b>	
Inland water bodies (standing water, running water) (1%)	
Bogs. Marshes. Water fringed vegetation. Fens (0.5%)	
Heath. Scrub. Maquis and garrigue <i>Phygrana</i> (5%)	
Dry grassland. Steppes (45%)	
Improved grassland (3.5%)	
Broad-leaved deciduous woodland (45%)	
<b>Annex I habitats that are a primary reason for selection of this site</b>	
Not applicable	
<b>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</b>	
4010 Northern Atlantic wet heaths with <i>Erica tetralix</i>	
4030 European dry heaths	
<b>Annex II species that are a primary reason for selection of this site</b>	
1083 Stag beetle <i>Lucanus cervus</i>	
Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for stag beetle <i>Lucanus cervus</i> , and a relatively large number of records were received from this site during a recent nationwide survey for the species (Percy <i>et al.</i> 2000). The site supports a number of other scarce invertebrate species associated with decaying timber.	
<b>Annex II species present as a qualifying feature, but not a primary reason for site selection</b>	
Not applicable.	

**Richmond Park SAC**

<b>Location of Richmond Park SAC</b>	
Country	England
Unitary Authority	Richmond upon Thames
Grid Ref*	TQ199728
Latitude	51 26 27 N
Longitude	00 16 28 W
SAC EU code	UK0030246
Status	Designated Special Area of Conservation (SAC)
Area (ha)	846.68
* This is the approximate central point of the SAC. In the case of large, linear or composite sites, this may not represent the location where a feature occurs within the SAC.	
<b>General site character</b>	
Inland water bodies (standing water, running water) (1.5%)	
Bogs. Marshes. Water fringed vegetation. Fens (0.5%)	
Heath. Scrub. Maquis and garrigue. Phygrana (25%)	
Dry grassland. Steppes (18%)	
Humid grassland. Mesophile grassland (5%)	
Improved grassland (20%)	
Broad-leaved deciduous woodland (25%)	
Mixed woodland (5%)	
<b>Annex I habitats that are a primary reason for selection of this site</b>	
Not applicable	
<b>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</b>	
Not applicable.	
<b>Annex II species that are a primary reason for selection of this site</b>	
1083 Stag beetle <i>Lucanus cervus</i>	
Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for <b>stag beetle <i>Lucanus cervus</i></b> , and is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.	
<b>Annex II species present as a qualifying feature, but not a primary reason for site selection</b>	
Not applicable.	

## **Special Protection Areas/RAMSAR**

A Special Protection Area (SPA) is a designation under the European Union Directive on the Conservation of Wild Birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain particularly threatened birds.

A Ramsar site is a wetland site designated to be of international importance under the Ramsar Convention. The Convention on Wetlands, known as the Ramsar Convention, is an intergovernmental environmental treaty established in 1971 by UNESCO, which came into force in 1975. It provides for national action and international cooperation regarding the conservation of wetlands, and wise sustainable use of their resources. Ramsar identifies wetlands of international importance, especially those providing waterfowl habitat.

### **Thames Estuary and Marshes SPA and RAMSAR site**

The Thames Estuary and Marshes SPA includes both marine and terrestrial habitats, and the marine area is also termed a European Marine Site. The marshes extend for around 15 km along the south side of the estuary, and also include some intertidal areas found on the north bank. It encompasses brackish, floodplain grazing marsh ditches and saline lagoons as well as intertidal saltmarsh and mudflat. This site was classified as both an SPA and a Ramsar Site (which covers approximately 5,500 hectares) on 31 March 2000.

The Thames Estuary and Marshes SPA qualifies under Article 4.1 of the EU Birds Directive as it supports internationally important populations of the regularly occurring Annex 1 species avocet and hen harrier. This Site also qualifies as an SPA under Article 4.2 of the EU Birds Directive as it supports internationally important populations of regularly occurring migratory species including Ringed Plover, Grey Plover, Dunlin, Knot, Black-tailed Godwit and Redshank. This SPA site also supports an internationally important assemblage of waterfowl as stated in Section 4.2 of the Directive, which include Gadwall, Shoveler, Tufted duck and Pochard.

The Thames Estuary and Marshes RAMSAR site qualifies under Criterion 2 as it supports 1 nationally rare and 14 nationally scarce plant species, as well as 1 endangered, 10 vulnerable and 12 rare invertebrate species. It also qualifies under Criterion 5 for its internationally important assemblage of waterfowl, and Criterion 6 for its internationally important numbers of over-wintering waterfowl.

The Thames Estuary and Marshes SPA is in the same location as the Essex Estuaries SAC.

### **Lee Valley SPA and RAMSAR site**

The Lee Valley SPA is designated for internationally important numbers of breeding and wintering wildfowl, especially Gadwall and Shoveler and for wintering Bittern.

Special Protection Areas within Lee Valley Regional Park include Amwell Quarry, Rye Meads, Turnford and Cheshunt Pits and Walthamstow Reservoirs SSSIs.

## APPENDIX B      RESPONSE BY STATUTORY BODIES TO DRAFT SEA SCREENING ASSESSMENT

----- Original Message -----

From: HNL Sustainable Places <[HNL Sustainable Places@environment-agency.gov.uk](mailto:HNL Sustainable Places@environment-agency.gov.uk)>

To: Pimlico Forum <[email@pimlicoforum.org](mailto:email@pimlicoforum.org)>

Date: 02/02/2021 17:15

Subject: RE: Pimlico Neighbourhood Plan SEA screening opinion

Dear Peter,

Thank you for consulting us on your SEA screening opinion for the Pimlico neighbourhood plan.

We regret that at present, we are unable to review this consultation. We are currently struggling with resource in our team due to Coronavirus.

We have had to prioritise our limited resource, and must focus on influencing plans where the environmental risks and opportunities are highest. For the purposes of neighbourhood planning, we have assessed those authorities who have “up to date” local plans (plans adopted since 2012, or which have been confirmed as being compliant with the National Planning Policy Framework) as being of lower risk. At this time, therefore, we are unable to make any detailed input on neighbourhood plans being prepared within this local authority area.

However, together with Natural England, English Heritage and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

<https://neighbourhoodplanning.org/toolkits-and-guidance/consider-environment-neighbourhood-plans/>

Kind regards

**George Lloyd**

Planning Advisor, Hertfordshire and North London Sustainable Places

**Environment Agency** | 2 Marsham Street, 3<sup>rd</sup> floor, London, SW1P 4DF

[HNL Sustainable Places@environment-agency.gov.uk](mailto:HNL Sustainable Places@environment-agency.gov.uk)

Date: 03 February 2021  
Our ref: 337519  
Your ref: Pimlico Neighbourhood Plan – SEA & HRA Screening



Mr P Ruback  
Chair  
Pimlico Neighbourhood Forum

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**  
[email@pimlicoforum.org](mailto:email@pimlicoforum.org)

Dear Mr Ruback

### **Pimlico Neighbourhood Plan – SEA & HRA Screen**

Thank you for your consultation request on the above dated and received by Natural England on 15<sup>th</sup> December 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### **Screening Request: Strategic Environmental Assessment**

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

#### **Habitats Regulations Assessment**

We agree with the conclusions of the HRA screening that there is no Likely Significant Effect on European sites and that a further appropriate assessment is not required.

#### **Neighbourhood Plan**

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.



Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

Yours sincerely

Sharon Jenkins  
Operations Delivery  
Consultations Team  
Natural England



Mr P Ruback  
Chair Pimlico Neighbourhood Forum

Our ref: PL00604483 and  
PL00731842

By Email: [email@pimlicoforum.org](mailto:email@pimlicoforum.org)

2<sup>nd</sup> February 2021

Dear Mr Ruback,

**Draft Regulation 15 version of the Pimlico Neighbourhood Plan and associated Strategic Environmental Assessment (SEA) screening opinion**

Thank you for consulting Historic England on the Regulation 15 draft of the Pimlico Neighbourhood Plan and the associated SEA screening opinion. The Government, through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012), has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, be consulted on neighbourhood plans where the Neighbourhood Forum consider our interest is affected by the plan.

As Historic England's remit is to advise on proposals affecting the historic environment our comments in this letter relate to the policies in the draft plan that relate to heritage. This is in the context of the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life for this and future generations.

**General Advice**

Historic England welcomes the creation of this plan and the consideration it gives to the local character of Pimlico. Great attention has clearly been paid to local character within the draft plan, demonstrating its importance to local residents and businesses. We have appreciated working with the neighbourhood forum on various elements on the neighbourhood plan to ensure that it will deliver a positive strategy for Pimlico's high-quality historic environment. In our view the revised wording overcomes previous concerns we raised about several of the policies, as set out in our letter dated 3<sup>rd</sup> October 2019.

**Strategic Environmental Assessment**

Two areas of the proposed Neighbourhood Plan raise particular questions about the necessity of SEA in Historic England's view.

Firstly, were policy 41 of the Draft City Plan to be adopted as per the excerpt on p.3 of the Neighbourhood Plan Topic Paper *Upward Extensions in the Pimlico Conservation Area*,



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HistoricEngland.org.uk



Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



Historic England would not consider that the Neighbourhood Plan would lead to additional significant environmental effects meriting SEA. This is because the impact of the policies in the Neighbourhood Plan, notably PIM 3, would be minimal compared to the draft policy on roof extensions developed by the City Council which has been subject to Sustainability Appraisal (SA).

However, we note that at present the City Council's draft policy<sup>41</sup> is subject to modifications as part of the Examination in Public process which the Council acknowledges will require a further SA. As such, the City Council's existing SA will shortly be superseded and should not be relied upon as a justification for not producing a SEA for this Neighbourhood Plan. Furthermore, if the City Council's revised draft policy on upwards extensions were to promote less change through upwards extensions than the Topic Paper suggests, then the proposed policy PIM 3 may merit SEA in our view. This is because of the scale of development promoted by PIM 3 would potentially have significant environmental effects that other plans may not be promoting or have tested through the SA or SEA process. We note that the Forum has produced detailed evidence as part of this consultation which could be used as part of any SEA were that eventually required.

Secondly, regarding policy PIM 24, we note that while this policy does seek to control the scale of development and potential mix of uses on one large site in the forum's area, it does not seek to allocate development to this or any other particular site. As such we do not consider that this policy would lead to significant environmental effects meriting SEA. To help avoid misinterpretation and keep it clear that you do not intend this policy to read as a site allocation policy we encourage you to rename it 'Major Development', rather than 'Major Development Sites'.

### Conclusion

We hope that these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this Neighbourhood Plan, and which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of your Plan.

Yours sincerely,

David English  
Development Advice Team Leader London  
E-mail: david.english@HistoricEngland.org.uk  
Direct Dial: 020 7973 3747



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Historic England

Mr P Ruback  
Chair Pimlico Neighbourhood Forum

Our ref: PL00604483 and  
PL00731842

By Email: [email@pimlicoforum.org](mailto:email@pimlicoforum.org)

28<sup>th</sup> April 2021

Dear Mr Ruback,

### **Pimlico Neighbourhood Plan Strategic Environmental Assessment screening opinion**

Further to Historic England's letter of 2<sup>nd</sup> February 2021, and subsequent clarification from the City Council that the Local Plan has now been adopted and that the full Integrated Impact Assessment process has been completed (email from Michael Clarkson dated 23<sup>rd</sup> April 2021), I am pleased to be able to offer the following advice.

As the City Plan policy relating to upwards extensions has been adopted following the necessary environmental assessment, Historic England does not consider that the Neighbourhood Plan would lead to additional significant environmental effects meriting SEA. This is because the degree of additional change caused by the policies in the Neighbourhood Plan, notably PIM 3, as demonstrated in the Topic Paper *Upward Extensions in the Pimlico Conservation Area*, would be minimal compared to the City Council's adopted policy on roof extensions.

### **Conclusion**

We hope that these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this Neighbourhood Plan, and which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of your Plan.

Yours sincerely,

David English  
Development Advice Team Leader London  
E-mail: [david.english@HistoricEngland.org.uk](mailto:david.english@HistoricEngland.org.uk)  
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Correspondence or information which you send us may therefore become publicly available.

Westminster City Council  
westminster.gov.uk



Planning Policy Team  
Westminster City Council  
17th Floor, City Hall 64 Victoria Street  
London SW1E 6QP

13<sup>th</sup> January 2021

Mr Peter Ruback  
Pimlico Neighbourhood Forum

Dear Mr Ruback,

**Westminster City Council comments on the Habitats Regulation Assessment (HRA) and Strategic Environment Assessment (SEA) screenings supporting the Pimlico Neighbourhood Plan (Reg 16 version)**

Thank you for your email dated 15<sup>th</sup> December regarding the Habitats Regulation Assessment (HRA) and Strategic Environment Assessment (SEA) screening reports supporting the Regulation 16 version of the Pimlico Neighbourhood Plan.

Although your email is primarily directed towards the relevant statutory consultees, you have also requested the council to provide comments on both the HRA and SEA screening reports.

Officers agree there is no need for the Pimlico Neighbourhood Forum to carry out a full HRA or SEA. Nevertheless, officers have a series of minor comments on both reports that can be found in Appendices 1 and 2.

As you are aware, the council's City Plan 2019-2040 is currently undergoing examination in public. Although the hearing sessions have now closed, the examination will not finish until the Planning Inspectors publish their report. The council is currently consulting on the Main Modifications recommended by the Inspectors. The Inspectors consider the modifications are required to make the Plan sound before it is adopted. More information can be found on the council's website.

We are committed to working constructively with you to ensure the Pimlico Neighbourhood Plan smoothly proceeds to independent examination.

Yours sincerely,

*Marina Mollà Bolta*

Marina Mollà Bolta

Planning Policy Officer

**Appendix 1: Comments on the HRA**

Section	Comment
Throughout the document	<p>The document sometimes references the “Regulation 15” version of the Plan and sometimes the “Regulation 16” version. For consistency, we recommend you follow the same terminology.</p> <p>The time period for the Plan is unclear. Although the Plan itself says it is “2020-2040”, references in this document say it is “2019-2040”. For consistency, we recommend you use the same period in all documents.</p>
Paragraphs 4.1 to 4.3	<p>These paragraphs reference Westminster’s Core Strategy screening documents. As a new City Plan 2019-2040 is now being examined, we recommend these paragraphs are deleted. You should focus on the most recent screenings. Please see documents EV_ENV_004 - Habitats Regulation Assessment Screening Report (WCC, June 2019) and CORE_006 - Integrated Impact Assessment (WCC, June 2019) that can be found on the new City Plan Examination Library.</p>
Paragraph 4.5	<p>The Examination of Westminster’s new City Plan 2019-2040 has not finished yet. The Examination will end when the Planning Inspectors publish the Inspector’s Report. Until then, the Examination remains open.</p>
Paragraph 4.5	<p>Typo: The word “Plabn” should be spelled “Plan”.</p>
Paragraphs 4.5 and 4.6	<p>These paragraphs read as if this HRA was an assessment of a Local Plan rather than a Neighbourhood Plan. We suggest you better explain why the Pimlico Neighbourhood Plan will not contribute to in-combination effects (by referencing what its policies do).</p>
Appendix – First paragraph	<p>Text is sometimes a bit unclear. It is not 100% clear which “framework” the paragraph is talking about.</p>
Appendix – Site characteristics and conservation objectives	<p>As explained above, the document should reference the new City Plan 2019-2040 HRA as it is more recent.</p>
Appendix – Special Protection Areas/RAMSAR	<p>This section would benefit from a short introduction explaining what the SPAs and RAMSAR are (like the one for the SACs).</p>
Maps	<p>The map called “Map showing the location of the Pimlico Neighbourhood Area within a 10km radius of SACs and SPAs” does not show where the Thames Estuary and Marshes SPA and RAMSAR site is. If this map shows the location of all the sites discussed in the report, there is no need for other maps to be included within it.</p>

**Appendix 2: Comments on the SEA**

Section	Comment
Throughout the document	<p>The document sometimes references the “Regulation 15” version of the Plan and sometimes the “Regulation 16” version. For consistency, we recommend you follow the same terminology.</p> <p>The time period for the Plan is unclear. Although the Plan itself says it is “2020-2040”, references in this document say it is “2019-2040”. For consistency, we recommend you use the same period in all documents.</p>
Paragraph 2.5	Typo: The reference should read “NPPF <b>National</b> Planning Practice Guidance”
Paragraph 4.3	Source needed.
Paragraph 4.7	This paragraph references Westminster’s Core Strategy screening documents. As a new City Plan 2019-2040 is now being examined, we recommend these paragraphs are deleted. You should focus on the most recent screenings. Please see documents EV_ENV_004 - Habitats Regulation Assessment Screening Report (WCC, June 2019) and CORE_006 - Integrated Impact Assessment (WCC, June 2019) that can be found on the new City Plan Examination Library.
Paragraph 4.8	Source needed.
Paragraphs 4.9 to 4.11	<p>Please note the council has now published more up to date information in relation to flood risk. For more information, please see proposed modification MM35 in CORE_028_V2 - Schedule of Main Modifications (Nov, 2020) that can be found on the new City Plan Main Modifications Consultation page.</p> <p>Officers can provide an updated map.</p>
Paragraph 4.14	Source needed.
Paragraph 4.15	Source needed.
Paragraph 4.19	Source needed.
Paragraph 5.2 – Table, question 4	Officers agree there is no need to carry out a full HRA.
Table 5.1 – 1 D	It is unclear what “Any existing environmental problems could be tackled” means.
Table 5.1 – 2 A	<p>The text reads as if development always has negative effects when it can also have positive effects.</p> <p>Officers disagree with the outcome of this assessment. Development on the Queen Mother’s Sport Centre site could bring some positive effects and will not only be negative.</p>
Table 5.1 – 2 D	The text reads as if the assessment was on the development proposed and it should be on the policies.
Table 5.1 – 2 E	Source needed.
Table 5.1 – 2 F	This section could reference Pimlico’s HRA.
Table 6.1 - iv	This section would benefit from a reference to policy PIM24.
Table 6.1 - vii	It is unclear what “sensitive heritage assets” are. You could also explain that higher level Plans like the new City Plan provide significant protection to heritage assets.
Appendix	See comments in Appendix 1.